IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA	**CASE NO.: 3:15-CR-00148**
Plaintiff,	**JUDGE ROSE**
vs.	
CONNIE M. APOSTELOS	**MOTION TO MODIFY BOND**
Defendant.	

Now comes the Defendant, **CONNIE M. APOSTELOS**, by and though her attorneys, **RION, RION & RION, L.P.A., INC.**, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond and removing her from EHDP for the reason that the charges pending at this time are substantially different than the original Indictment. Counsel consulted with the U.S. Attorney's Office who indicated that they would defer to Pre-Trial Services in this matter. Defendant entered a Plea in this matter on Tuesday, April 4, 2017. The case is currently set for Sentencing on August 2, 2017. Defendant respectfully requests to be removed from EHDP while she awaits sentencing.

Respectfully submitted,

/s/ Jon Paul Rion

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the office of the U.S. Attorney on the same day of filing.

/s/ Jon Paul Rion
JON PAUL RION
RION, RION & RION, L.P.A., INC.